

Ostroff, Ethan G.

From: Leonard Bennett [<mailto:lenbennett@cox.net>]
Sent: Friday, March 18, 2011 3:07 PM
To: Derby, Erin Rigney
Cc: jbazaz@siplfirm.com; matt@clalegal.com; Anthony, David N.; jhamlin@glasserlaw.com; gkronenberg@morrisrismosrris.com; trollins@fullertonlaw.com; bcasey@taylorwalkerlaw.com
Subject: Re: Wilkes v. GMAC Mortgage, et al

Thank you counsel. I am of course surprised that GMAC is not intending to call any of its own employees or but a few actual human beings (the kind with first and last names) in its defense.

In all seriousness - we will object to later supplementation of employees or documents that are as of today known to GMAC. (As opposed to Rule 26(e) supplementation of newly discovered witnesses or documents). We will not object to supplementation that is served within the next two weeks.

Further, our agreement was that the parties would provide the actual documents they disclose under Rule 26(a)(1).

Please govern yourselves accordingly,

Len Bennett

On Mar 18, 2011, at 2:52 PM, Derby, Erin Rigney wrote:

Please see attached.

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<GMAC's 26(a)(1) Disclosures.pdf>